

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KAYVAN KAROON and  
KAMRAN KAROON, individually  
and as Administrators of the Estate  
Of MAJID KAROON, and  
MAHIN D. KAROON,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG and  
CREDIT SUISSE AG,

Defendants.

Case No. 1:15-cv-04643-JPO

**DECLARATION OF**  
**INA E. HASDENTEUFEL**

INA E. HASDENTEUFEL, pursuant to 28 U.S.C. § 1746, declares:

1. I hold the position of “Head Litigation Switzerland” with Credit Suisse AG (“CSAG”), a defendant herein. The statements set forth herein are true to the best of my knowledge. They are based on my personal knowledge or a review of documents or information in the course of my duties .

2. I am an attorney admitted to the practice of law in the State of New York. Since August 2005, I have been employed by CSAG and posted to its offices in Zurich. I have held my current position as “Head Litigation Switzerland” since February 2011. I am responsible for Swiss/International Litigation, Labor Law, Regulatory Inquiries & Enforcement and Security Services in Switzerland.

3. CSAG is a bank organized under Swiss law. Its principal place of business is in Zurich. CSAG is a wholly owned subsidiary of Credit Suisse Group AG

("CSGAG"), a publicly traded holding company also organized under Swiss law. CSGAG's principal place of business is also in Zurich.

4. CSAG operates many branches in Switzerland and from time-to-time has operated branches or representative offices in a number of other countries. In the United States CSAG operates a branch only in New York and it operates representative offices only in Los Angeles, San Francisco and San Diego.

5. CSAG maintains its New York Branch at 11 Madison Avenue, New York, New York.

6. CSAG employs approximately 100 persons in New York.

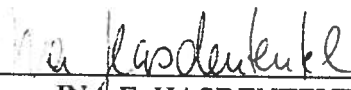
7. CSGAG, a holding company, operates in the US through subsidiaries only. The addresses plaintiffs identify in their complaint, 11 Madison Avenue, 1 Madison Avenue, 315 Park Avenue South, and 12 East 49<sup>th</sup> Street, are New York City addresses from which some of these subsidiaries conduct business.

8. CSGAG does not have offices or employees in New York.

9. I understand from the complaint that plaintiffs allege that Majid Karoon had a relationship with Bank Leu. In 1990, a predecessor of CSGAG acquired the majority of the shares of Bank Leu AG. In 2007 Bank Leu AG was merged into Clariden Leu AG. In 2012 Clariden Leu AG was merged into CSAG.

I declare under penalties of perjury that the foregoing is true and correct.

New York, New York  
Executed on August 20, 2015

  
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INA E. HASDENTEUFEL